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May 25, 2022

**BY ELECTRONIC CASE FILING**

The Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Hernan Lopez*, Case No. 15-cr-252 (PKC)

Dear Judge Chen,

We write on behalf of all parties to request a brief adjournment of the trial date in this matter, which was recently rescheduled to begin on January 3, 2023. The current schedule contemplates beginning the jury selection process immediately before the Christmas holiday, with jurors to return after the New Year to complete jury selection and begin trial. If it is feasible for the Court, the parties believe that beginning the jury selection process after the New Year, as in the proposed schedule below, will greatly reduce the significant potential for disruption in the jury selection process over the holiday period. We believe this brief adjournment will likely allow more potential jurors to serve and result in a more representative panel of potential jurors. It will also mitigate, to some extent, the disruption over the holidays to the parties, counsel and witnesses (and hopefully the Court).

Accordingly, the parties jointly request that the Court consider revising the current schedule as follows:

- January 5-6: Prospective jurors fill out questionnaires
- January 12: Parties file challenges for cause under seal
- January 13: Hearing on challenges for cause and complete voir dire
- January 17: Trial begins

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We are grateful for the Court's consideration of this request, and we would be happy to discuss a potential alternative schedule at the Court's convenience.

Respectfully submitted,

/s/ David Sarratt  
David Sarratt

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cc: All Counsel of Record (via ECF)  
Clerk of Court (PKC) (via ECF)